



*Town of Mansfield
Department of Public Works
Six Park Row
Mansfield, MA 02048*

April 3, 2012

Ms. Kathleen M Baskin, Director of Water Policy
The Commonwealth of Massachusetts
Executive Office of Environmental Affairs
100 Cambridge Street, 9th Floor
Boston, MA 02114

RE: Town of Mansfield Ten Mile River Basin Permit No. 9P2-4-27-167.01

Dear Ms. Baskin:

We appreciate the opportunity you provided the Town with to hear first-hand the efforts your office is making on the sustainable water management initiative and realize how difficult it must be to balance the concerns of the water suppliers, environmental groups and the regulatory agencies in developing guidelines for water withdrawal permit renewals. We also feel that the Town has shown stewardship in managing these water resources, including those within the Ten Mile River Basin.

The Town was issued Water Management Act Permit No. 9P2-4-27-167.01 for Witch Pond Well No. 10 in 2001 for a withdrawal of 0.99 million gallons per day (mgd) from the Ten Mile River Basin. The purpose of the well was to provide some redundancy and flexibility with the operation of the Town's public water supply wells and allow the Town to balance its withdrawals between the Ten Mile and Taunton River Basins. At the time this was especially critical since the Town's three Albertini Wells were not being used due to high iron and manganese levels. Since development of this well, the Town has implemented significant improvements in how it manages its water resources. These include installing a supervisory control and data acquisition system (SCADA) for controlling the pumping from the Ten Mile River Basin wells to ensure that the Town stays within its registered and permitted limits and to comply with the hydrologic and wetlands monitoring requirements of the permit. The nine years of hydrologic and wetlands monitoring has shown that the pumping of Morrison Well No. 10 has not had any detrimental impact to the surrounding water resources, including the adjacent Witch Pond Swamp. During this same time period the Town also implemented an extensive water conservation program which has included: a meter replacement program and installation of a drive by radio read system for water meter reading, providing water conservation devices, such as low flow showerhead and faucets to Town residents, a rebate program for various products such as low flush toilets, clothes and dishwasher replacement with low flow units, programmable lawn sprinkler rain sensor for irrigation shut off, offering free water audits to Town residents, implementing summer time outdoor water use restrictions, giving out

approximately 1,000 rain barrels and an extensive public education program. Through these efforts the Town consistently achieves less than the thresholds for per capita consumption of 65 gpcd and for unaccounted for water of less than 10 percent.

With that background, the Town is concerned that the permitted volumes for the Ten Mile River Basin have been eliminated from the proposed NEW baseline and that the Town would not be able to utilize Morrison Well No. 10 to its full extent after having spent considerable amounts of money in developing and permitting the well. In addition, the Town is currently constructing an SRF financed water treatment facility that has the capacity to treat water from the Albertini Wells and the other wells located in the Ten Mile River Basin. This expenditure is approximately \$5,000,000. Again, the Town has the same concern that we will have spent \$5,000,000 of both local and state money and will not be able to utilize the water treatment facility to its fully capabilities.

In addition, we note in the table of Ten Mile River Basin withdrawals that certain withdrawals, such as Attleboro, Rustoleum Corp and Texas Instruments are being allowed to maintain their entire permitted volume under the proposed NEW baseline and further that Attleboro has exceeded the combined permitted and registered withdrawals without any penalty, while Mansfield, which has made the efforts to conserve water consumption and which was unable to pump the volume from the Albertini Well due to a concern with water quality, is being penalized with the loss of the permitted withdrawal volumes.

The Town is also concerned that we have already made a full concerted effort to reduce our water consumption as noted above and as such we have already completed all feasible offset/mitigation actions necessary to maintain the 0.99 mgd permitted allocation. We would like acknowledgement from MassDEP that with completion of the water conservation measures discussed above, that the Town has already completed all feasible offset/mitigation actions that are required to maintain their permitted allocation.

Based on these considerations the Town requests that the proposed NEW baseline flow for the Town's Ten Mile Basin share be increased by the amount of our permitted volume or 0.99 mgd for a total of 1.58 mgd since the town has completed all feasible offset/mitigation actions.

Sincerely,

Town of Mansfield

A handwritten signature in dark ink, appearing to read 'Lee Azinheira', with a long horizontal flourish extending to the right.

Lee Azinheira, P.E, Director
Department of Public Works

LA/rg

Cc: William Ross, Town Manager
Kurt Gaffney, Water Operations Manager
Robert Chapell, Woodard & Curran